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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
ABILENE DIVISION

IN RE:	§ CHAPTER 13
Timothy Bryan Hernandez	§ CASE NO. 10-10019-RLJ-13
AND	§
Candi Nicole Hernandez	§ HEARING DATE: May 1, 2014
DEBTOR(S)	§ HEARING TIME: 11:00 AM

MOTION TO MODIFY TERM OF CHAPTER 13 PLAN AFTER CONFIRMATION

1. The Debtors, by their attorney, state and represent as follows:
2. That since confirmation of the Chapter 13 plan on April 5, 2010, the Debtors have completed all payments required under the confirmed plan.
3. That under §1328(a) of the Bankruptcy Code, "the court **shall** grant the debtor a discharge" if the Debtor has completed all payments under the plan.
4. That Debtors' confirmed plan required plan payments of \$883.00 for 60 months for a total plan base of \$62,714.00.
5. That on March 11, 2014, Trustee received and accepted the final payment required toward the plan base.
6. That Debtors made the lump sum payment to the Trustee with funds received 2013 Federal Income Tax Refund.
7. That Debtors have paid off the Chapter 13 plan in good faith.
8. That Debtors seek a modification under §1329(a) to decrease the plan term from 60 to 50 months.

WHEREFORE, the Debtors move this honorable court to enter an order modifying the term of Debtors' confirmed Chapter 13 plan to March 2014 months, thereby allowing the Debtors to receive a Chapter 13 Discharge Pursuant to 11 U.S.C. §1328(a), and to other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on March 26, 2014 on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtor(s)